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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA **F I L E D**

AUG 5 1999

CASE NO. 98-CV-186-C (M)

Phil Lombardi, Clerk
U.S. DISTRICT COURT

**MARY RAE PRUITT, WINDELL MICHELLE GOOSBY,
AND YOLANDA YBARRA,**

Plaintiffs,

vs.

**BORG-WARNER SECURITY CORPORATION,
a foreign corporation, ORVEL LEE THOMPSON,
individually and in his capacity as employee of Borg-Warner
Security, and as a correctional officer for the State of Oklahoma,
FREEDOM HOUSE, INC., d/b/a FREEDOM RANCH,
a corporation,**

Defendants.

**MOTION FOR SUMMARY
JUDGMENT OF DEFENDANT FREEDOM RANCH, INC.**

BEST & SHARP

**AMY E. KEMPFERT, OBA #4950
KAREN M. GRUNDY, OBA #14198
ALEX L. HAMMACK, OBA #17736
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ATTORNEYS FOR DEFENDANT FREEDOM RANCH, INC.

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Clj

(218-7)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

MARY RAE PRUITT, WINDELL)
MICHELLE GOOSBY, and)
YOLANDA YBARRA)
)
Plaintiffs,)
)
v.) Case No. 98-CV-186-C (M)
)
WELLS FARGO CORPORATION,)
a foreign corporation, ORVEL LEE)
THOMPSON, individually and in his)
capacity as employee of Wells Fargo,)
and as a correctional officer for the)
State of Oklahoma, FREEDOM)
HOUSE, INC., d/b/a Freedom Ranch,)
a corporation,)
)
Defendants.)

**MOTION FOR SUMMARY JUDGMENT
OF DEFENDANT FREEDOM RANCH, INC.**

COMES NOW the Defendant, Freedom Ranch, Inc., and files this Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure on Plaintiffs' remaining claims.

In support of this Motion, the Defendant would show the Court that there is no germane issue as to any material fact, and that Freedom Ranch is entitled to judgment as a matter of law.

In further support of this Motion, the Defendant refers the Court to its Brief in Support, filed contemporaneously herewith.

WHEREFORE, premises considered, Defendant Freedom Ranch, Inc. prays this Honorable Court enter judgment in its favor and against the Plaintiffs pursuant to Rule 56 of the Federal Rules of Civil Procedure.

Respectfully submitted,

BEST & SHARP

By: Karen M. Grundy
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CERTIFICATE OF MAILING

This is to certify that on this the 5 day of August, 1999, a true, correct and exact copy of the above and foregoing instrument was mailed to:

G. Steven Stidham
SNEED, LANG, P.C.
2 W. 2nd St., Ste. 2300
Tulsa, OK 74103-3136

Richard D. Wagner
WAGNER, STUART & CANNON
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Stanley D. Monroe
MONROE & ASSOCIATES
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with proper postage thereon fully paid.

Karen M. Grunby